<center>**REMARKS**</center>

Reconsideration of this application, as amended, is respectfully requested.

Claims 1-3, 5-28 and 30-37 are pending. Claims 1-3, 5-28 and 30-37 stand rejected.

Claims 1, 3, 5, and 6 have been amended. Claim 2 has been canceled. No claims have been added. Support for the amendments is found in the specification, the drawings, and in the claims as originally filed. Applicants submit that the amendments do not add new matter.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

The following is a summary of the Examiner's telephone interview with Tatiana Rossin (patent agent for the applicants) that was held on June 29, 2007. Claim 1, as amended, was discussed in light of the references cited by the Examiner. Tatiana Rossin proposed to further amend claim 1 to include wherein the determining includes mapping an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client. In response, the Examiner asked Tatiana Rossin to prepare the supplemental amendment to include the proposed limitations, and send the supplemental amendment to the Examiner by Tuesday, July 3, 2007.

Claims 1-3, 5-28 and 31-37 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Applicants have amended claims 1, 3, 5, and 6 in light of the Examiner's rejection. Therefore, applicants respectfully submit that claims 1-3, 5-28, and 31-37 are now patentable under 35 U.S.C. § 112, second paragraph.

Claims 1-3 and 5-7 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,438,652 to Jordan et al. ("Jordan") in view of U.S. Patent No. 6,249,801 to Zisapel et al. ("Zisapel").

Applicants respectfully submit that amended claim 1 is not obvious under 35 U.S.C. § 103(a) over Jordan in view of Zisapel.

Amended claim 1 reads as follows:

> A method, comprising:
> receiving from a client a request for an information object, wherein the information object includes content;
> > determining one or more information object repositories from a plurality of information object repositories to service the client's request for the information object without regard as to whether the information object is actually stored at the information object repository selected according to load on the information object repositories and at least one type-of-service parameter out of a plurality of the type-of-service parameters, wherein the plurality of the type-of-service parameters comprise one or more of an average delay from the information object repositories to the client, average processing delays at the information object repositories, reliability of a path from the information object repositories to the client, or available bandwidth in said path, wherein the determining includes mapping an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client; and
> returning to the client an address of the selected information object repository.

(Amended claim 1)(emphasis added)

It is respectfully submitted that neither Jordan, nor Zisapel discloses mapping of an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client, as recited in amended claim 1. The amendments are supported by the Specification (see, for example, paragraphs [0078], and [0083])

The Examiner acknowledged that Jordan does not disclose "returning to the client an address of the selected information object repository, or that the type-of-service parameters are average delay from the information object repositories to the client, average processing delays at the information object repositories, reliability of a path from the information object repositories to the client, or available bandwidth in said path."(Office Action, p. 4, 01/08/07).

Jordan teaches shifting forwarded requests to cooperating cache servers. More specifically, Jordan discloses forwarding the request for the object to one of cooperating caching servers if the requested object cannot be found locally.

Zisapel, in contrast, discloses a triangulation load balancing system that has a plurality of load balancers (**Figures 1A-1C, 2A-2F**). More specifically, Zisapel discloses that the load balancers maintain server status information (col. 5, lines 20-25). In particular, Zisapel discloses the load balancer LB1 maintaining a proximity table 54 (**Figure 2E**) that contains the address of the client and the address of the closest load balancer (col. 7, lines 18-60).

It is respectfully submitted that Jordan does not teach or suggest a combination with Zisapel, and Zisapel does not teach or suggest a combination with Jordan. It would be impermissible hindsight, based on applicants' own disclosure, to combine shifting forwarded requests of Jordan into load balancing of Zisapel.

Furthermore, even if Jordan and Zisapel were combined, such a combination would still lack mapping of an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client, as recited in amended claim 1.

Given that claims 3 and 5-7 depend from amended claim 1, and add additional limitations, applicants respectfully submit that claims 3 and 5-7 are not obvious under 35 U.S.C. § 103(a) over Jordan in view of Zisapel.

Claims 8-10, 2-28, 31, and 34-37 have been rejected under 35 USC § 103(a) as being unpatentable over Jordan and Zisapel in further view of U.S. Patent No. 6,304,913 to Rune ("Rune").

Rune, in contrast, discloses selecting a closest server from a plurality of alternative servers, and fails to disclose <u>mapping of an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client,</u> as recited in amended claim 1.

It is respectfully submitted that neither Jordan, Zisapel, nor Rune teaches or suggest a combination with each other. It would be impermissible hindsight, based on applicants' own disclosure, to combine shifting forwarded requests of Jordan and load balancing of Zisapel into selecting a closest server of Rune.

Furthermore, even if Jordan, Zisapel, and Rune were combined, such a combination would still lack <u>mapping of an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client,</u> as recited in amended claim 1.

Claim 2 has been canceled.

Given that claims 8-10, 3-28, 31, and 34-37 depend from amended claim 1, and add additional limitations, applicants respectfully submit that claims 8-10, 3-28, 31, and 34-37 are not obvious under 35 U.S.C. § 103(a) over Jordan, in view of Zisapel, and further in view of Rune.

Claims 11-15, 30, 32, and 33 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Jordan and Zisapel in view of U.S. Patent No. 6,205,477 to Johnson et al. ("Johnson").

Johnson, in contrast, discloses distributing a service request among a plurality of servers (Abstract), and fails to disclose mapping of an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client, as recited in amended claim 1.

It is respectfully submitted that neither Jordan, Zisapel, nor Johnson teaches or suggests a combination with each other. It would be impermissible hindsight, based on applicants' own disclosure, to combine shifting forwarded requests of Jordan, load balancing of Zisapel into the traffic redirection system of Johnson. Furthermore, even if Jordan, Zisapel, and Johnson were combined such a combination would lack the discussed limitations of amended claim 1.

Given that claims 11-15, 30, 32, and 33 depend from amended claim 1, and add additional limitations, applicants respectfully submit that claims 11-15, 30, 32, and 33 are not obvious under 35 U.S.C. § 103(a) over Jordan, in view of Zisapel, and further in view of Johnson.

Claims 16-20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Jordan and Zisapel in view of European Patent No. EP 0959 601 to Chauhan ("Chauhan").

Chauhan, in contrast, discloses selection of a server for mirrored sites, and similarly to Jordan and Zisafel, fails to disclose mapping of an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client, as recited in amended claim 1.

It is respectfully submitted that neither Jordan, Zisapel, nor Chauhan teaches or suggests a combination with each other. It would be impermissible hindsight, based on applicants' own disclosure, to combine shifting forwarded requests of Jordan, load balancing of Zisapel into the system for server selection of Chauhan.

Furthermore, even if Jordan, Zisapel, and Chauhan were combined such a combination would lack <u>mapping of an address of the client to an address of a selected information object repository of the one or more information object repositories based on a Web Information Locator by Distance (WILD) protocol, wherein the information object repository delivers the content to the client</u>, as recited in amended claim 1.

Given that claims 16-20 depend from amended claim 1, and add additional limitations, applicants respectfully submit that claims 16-20 are not obvious under 35 U.S.C. § 103(a) over Jordan, in view of Zisapel, and further in view of Chauhan.

It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections have been overcome. If the Examiner believes a further telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Tatiana Rossin at (408) 720-8300.

If there are any additional charges, please charge them to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: June 29, 2007   By: /Tatiana Rossin/
                                  Tatiana Rossin
                                  Reg. No. 56,833

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(408) 720-8300
Fax No. (408) 720-8383